

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

RYAN, LLC,

*Plaintiff,*

v.

Civil Action No. 3:24-cv-0986-E

FEDERAL TRADE COMMISSION,

*Defendant.*

**MOTION OF PROSPECTIVE *AMICUS CURIAE* MATT GAETZ TO WAIVE LOCAL  
COUNSEL REQUIREMENT OF LOCAL RULE 83.10**

Non-party and prospective *amicus curiae* **Matt Gaetz**, through undersigned counsel and pursuant to N.D. Texas L.R. 83.10(a), respectfully moves this Court for leave to waive that rule's requirement to obtain local counsel who resides or has a principal office within 50 miles of the courthouse. In support, prospective *amicus* states:

1. Prospective *amicus* is a Member of Congress of the United States of America. He sits on the House Judiciary Committee, tasked with oversight of the federal courts and our nation's antitrust laws. He has a special interest in ensuring that the interests of the federal Congress are taken into consideration.
2. Prospective *amicus* anticipate that the filing of his brief and related documents will be his only participation in this matter before the Court. Given his minimal involvement in the case, local counsel would be unnecessary, and good cause exists for a waiver from Local Rule 83.10(a)'s requirements. The Court has granted similar motions on behalf of *amici* in this case.
3. Pursuant to Local Rule 7.1(a), counsel for plaintiffs and defendants have consented to the filing of *amicus*'s proposed brief in this matter, without reference to local counsel.

4. A proposed order is attached.

### CONCLUSION

The Court should grant *amicus curiae* leave to waive the local counsel requirement.

Dated: June 4, 2024

Respectfully submitted,

Andrew Kloster

New York State Bar No. 4960399

*General Counsel, Office of Representative Matt*

*Gaetz*

### CERTIFICATE OF CONFERENCE

I hereby certify that on May 30, 2024, I conferred with counsel for Plaintiff, counsel for Plaintiffs-Intervenors, and counsel for the FTC for their position on this motion. All parties consented to the filing thereof.

/s/ Andrew Kloster  
Andrew Kloster

### CERTIFICATE OF SERVICE

I hereby certify that, on June 4, 2024, I caused the foregoing document to be filed with the Clerk of the Court of the United States District Court for the Northern District of Texas using the Court's CM/ECF system, which will send notice to the ECF counsel of record.

/s/ Andrew Kloster  
Andrew Kloster